

**RAC II NATIONAL MODEL STATEMENT OF WORK FOR
NON-TIME CRITICAL REMOVAL SUPPORT (NS)**

Revision 0

**Gulfco Marine Maintenance Superfund Site
Brazoria County, Texas
August 18, 2010**

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FOR NON-TIME-CRITICAL REMOVAL SUPPORT (NS)
Revision 0**

**Gulfco Marine Maintenance Superfund Site
Brazoria County, Texas
August 18, 2010**

Contract No: EP-W-06-004

Task Order No:

Introduction

PURPOSE

The purpose of this task order is to implement the non-time-critical removal support (NTCRS) at the Gulfco Marine Maintenance Superfund Site (Site) to select a removal action to eliminate, reduce, or control risks to human health and the environment. This statement of work (SOW) sets forth the framework and requirements for the NTCRS. The NTCRS shall consist of preparation of an Engineering Evaluation and Cost Analysis (EE/CA) report and a PRELIMINARY DRAFT Action Memorandum for the repair of an existing cap over the former impoundments and for a wetland sediment hot-spot removal. However, EPA shall determine the selected removal alternative. Current sampling being performed at the Site will determine whether the wetland sediment hot-spot removal will be necessary. For planning purposes, the sediment removal is to be included in the scope of this EE/CA, and will remain a part of this SOW until or unless the current sampling results indicate that the sediment hot-spot removal is not necessary to protect human health and the environment. The sampling results are expected to be available sometime in the October 2010 timeframe. The goal for completion of this task order is May 31, 2011.

SITE DESCRIPTION

The Site is located in Freeport, Texas at 906 Marlin Avenue (also referred to as County Road 756). The Site consists of approximately 40 acres within the 100-year coastal floodplain along the north bank of the Intracoastal Waterway between Oyster Creek approximately one mile to the east and the Texas Highway 332 bridge approximately one mile to the west. The Site includes approximately 1,200 feet (ft.) of shoreline on the Intracoastal Waterway, a coastal shipping canal that extends from Port Isabel to West Orange on the Texas Gulf Coast.

Marlin Avenue divides the Site into two areas. The property to the north of Marlin Avenue consists of wetlands and the closed surface impoundments. The property south of Marlin Avenue was developed for industrial uses with a dry dock, sand blasting areas, an aboveground storage tank (AST) tank farm, and two barge slips connected to the Intracoastal Waterway. The Site was operated as a barge cleaning and repair facility from 1971 until 1999.

The former surface impoundments were three earthen pits with natural clay liners located in Lot 56 on the north side of Marlin Avenue. These former impoundments were used for storage of waste oils, caustics, various organic chemicals, and wash waters generated during barge cleaning activities. The former impoundments were closed in 1982 when the liquids and majority of sludges were removed and the remaining sludge was solidified with soil and left in place. The former impoundments were then capped with 3-feet of clay cover and a hard wearing (shell) surface. During recent investigations

at the Site, the cap was found to be between 2.5-feet and 3.6-feet thick, and was rutted on the western end.

Recent investigations at the Site found that the sediment north of Marlin Avenue contained several chemicals of potential ecological concern at concentrations exceeding the screening levels. These chemicals include polynuclear aromatic hydrocarbons and several metals. At this time sediment samples are being collected by the Respondents for the Site, and the Respondents will conduct bioassays to determine the toxicity of this material.

GENERAL REQUIREMENTS

This is a term-form task order that requires the contractor to provide a completed Engineering Evaluation and Cost Analysis (EE/CA) report that, when implemented through a removal action, will eliminate, reduce or control risks to human health and the environment. Furnish all necessary and appropriate personnel, materials, and services needed for, or incidental to, performing and completing the NTCRS. The NTCRS and associated deliverables required under this task order shall be consistent with the EE/CA, the *Remedial Design/Remedial Action (RD/RA) Handbook* (U.S. EPA Office of Solid Waste and Emergency Response (OSWER) 9355.0-04B, EPA 540/R-95/059, June 1995), all other guidance used by EPA in conducting an NTCRS (Attachment 3), and the requirements of this SOW. The NTRC involves the procurement of an analytical subcontractor(s).

In conducting the task order, EPA expects the contractor to propose the most appropriate and cost-effective procedures and methodologies using accepted engineering practices and controls. Throughout the performance of this task order, EPA expects the contractor to be responsible for performing services and providing products at the lowest reasonable cost. If the contractor fails to meet the requirements within the negotiated costs, the government may elect to provide the contractor with additional funds to complete the task order without providing any additional fee. If there are changes to the SOW by the government, the government will issue a formal amendment to the SOW and negotiate the cost of the amendment with the contractor to form a new cost estimate.

A summary of the potential major deliverables and proposed schedule for submittals is in Attachment 1. This summary and schedule can be used as the basis for the contractor's proposed deliverables and schedules included in the work plan. Submit the major deliverables using the Transmittal of Documents for Acceptance by EPA Form (Attachment 4). The EPA **Task Order Monitor (TOM)** ~~Work Assignment Manager (WAM)/Contracting Officer Representative (COR)~~ will track deliverables submitted by the contractor using the Transmittal Register (Attachment 5).

A list of primary guidance and reference material is attached (Attachment 3). In all cases, the contractor shall use the most recently issued guidance.

Communicate at least weekly with the EPA TOM, either in face-to-face meetings or through conference calls. Document all decisions that are made in meetings and conversations with EPA via the monthly progress reports. EPA will provide oversight of contractor activities throughout the NTCRS. EPA review and approval of deliverables is a tool to assist this process and to satisfy, in part, EPA's responsibility to provide effective protection of public health, welfare, and the environment. EPA will review deliverables to assess the likelihood that the NTCRS will achieve its goals and that its performance and operations requirements have been met. Acceptance of deliverables by EPA does not relieve the NTCRS contractor for the adequacy of the deliverables or from their professional responsibilities.

RECORD KEEPING REQUIREMENTS

Maintain all technical and financial records for the NTCRS in accordance with the contract. At the completion of the task order, submit an official record of the NTCRS in both compact disk and a hardcopy to the TOM. Provide the deliverables using electronic media.

US EPA PRIMARY CONTACTS

The primary contact for this task order is Gary Miller. He can be reached at (214) 665-8318, via facsimile at (214) 665-6660, or via e-mail at miller.garyg@epa.gov. His mailing address is US EPA Region 6, 1445 Ross Avenue, Dallas, Texas 75202-2733.

TASK ORDER COMPLETION DATE AND PROJECT CLOSEOUT

The completion of the task order, perform all necessary project closeout activities as specified in the contract. These activities include closing out any subcontracts, indexing and consolidating project records and files as required above, and providing a technical and financial closeout report to EPA. The goal is to complete task order technical activities and closeout activities by May 31, 2011.

NTCRS Work Planning

WORK PLAN

WBS: 1.1

Prepare and submit a NTCRS work plan that includes a detailed description of implementation activities, performance monitoring, and overall management strategy, including optimization, for the NTCRS. Typical activities involved in preparing the work plan include, but are not limited to, the following:

- Contacting the **TOM Contracting Officer Representative (COR)** within five calendar days after receipt of the Statement of Work from EPA to schedule the scoping meeting or work plan development conference call to be conducted between EPA and the contractor. Regional personnel will be available to meet with the contractor after the initial scoping meeting to discuss and clarify any issues the contractor may have regarding this project. Contact the TOM to schedule this meeting at least five working days before the proposed meeting date.
- ~~Conducting a site visit with the TOM during the NTCRS planning phase to assist in developing an understanding of the Site and any logistics. [A site visit may not be necessary if the NTCRS contractor is familiar with the site. If this is the case, delete this paragraph/bullet.] (NOT REQUIRED)~~
- Preparing and submitting a final NTCRS work plan within 30 calendar days after **issuance of this SOW** ~~the scoping meeting~~. The work plan shall include a detailed description of the technical approach for the NTCRS activities. Specify the necessary procedures, inspections, deliverables, and schedules. Include a comprehensive implementation management schedule for completion of each major activity and submittal.
- Preparing the estimated cost to complete the task order, including subcontractor costs, for each element of the SOW; providing a breakdown of the cost by task and subtask levels, in accordance with the contract work breakdown structure (WBS).

- Negotiating and preparing a revised work plan, if the contractor fails to meet the Region's minimum standards. Note that EPA does not anticipate a need to re-negotiate with the contractor nor to require the contractor to revise the work plan. Contractor costs associated with the preparation of the revised work plan and cost estimate shall be paid by the government but shall not bear fee.
- Providing conflict of interest disclosure.

SITE-SPECIFIC PLANS

WBS: 1.2

Review all existing site-specific plans and prepare, update, and/or maintain plans, as necessary, for NTCRS implementation. Incorporate the plans and procedures received from any subcontractor(s) into the overall site plans. Should the contractor fail to meet the required standards in accordance with the appropriate legal, regulatory, and EPA guidance, prepare revised site-specific plans. (**NOTE:** In that event, contractor costs associated with the preparation of the revised site-specific plans shall be paid by EPA but shall not bear fee.) Typical plans include, but are not limited to, the following:

- Sampling and Analysis Plan (SAP) in accordance with 40 CFR 300.415(b)(4)(ii).
- Site-specific Health and Safety Plan (HSP) that specifies employee training, protective equipment, medical surveillance requirements, standard operating procedures, and a contingency plan in accordance with 29 CFR 1910.120(l)(1) and (l)(2). **NOTE:** The RI/FS HSP may be modified for use if appropriate.

POLLUTION LIABILITY INSURANCE

WBS 1.3

Prepare and submit costs to the Contracting Officer for approval for task order-specific Pollution Liability Insurance, if the contractor plans to bill insurance premiums as a direct charge to the task order and there is no contract-wide Pollution Liability Insurance. (**NOTE:** Track and report all costs associated with this subtask separately and in accordance with the Reports of Work, Attachment B, of this contract.)

Project Management and Reporting

Value: 10% Base Fee

PROJECT MANAGEMENT

WBS: 1.4

Perform activities required to effectively manage the task order. These activities typically include, but are not limited to, the following:

- Monitoring costs and progress.
- Preparing and submitting monthly progress reports that document monthly and cumulative cost, performance status, and technical progress.
- Preparing and submitting monthly invoices in accordance with the level of detail as specified in the contract.
- Manage, track, and report status of site-specific equipment.
- Participating in meetings and preparing and submitting meeting summaries.

- Accommodating any external audit or review mechanism that EPA requires.
- Evaluating existing data, including usability, when directed by EPA.
- Coordinating with local and emergency response teams.
- Reviewing background documents as directed by EPA.
- Attending EPA-held training.

COMMUNITY INVOLVEMENT (CR)

WBS: 2

Prepare and implement the Community Involvement Plan (CIP) for the site. Perform community involvement activities in support of EPA throughout the NTCRS in accordance with the *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP, 40 CFR Part 300) and the *Community Relations in Superfund - A Handbook*, (U.S. EPA, Office of Emergency and Remedial Response, OSWER Directive No. 9230.0-3C, January 1992). These tasks include, but are not limited to, the following:

- ~~Conducting community interviews.~~ **(NOT REQUIRED)**
- ~~Developing Community Involvement Plan (CIP).~~ **(NOT REQUIRED)**
- Providing public meeting and/or open house support: budget for (1) open house.
- Preparing fact sheets, notices and other informational documents: budget for (2) fact sheets.
- ~~Providing support for proposed plan.~~ **(NOT REQUIRED)**
- ~~Providing public hearing support.~~ **(NOT REQUIRED)**
- Publishing public notices in local newspapers serving the site community: budget for (1) newspaper notice.
- Maintaining public information repository.
- ~~Developing and updating site mailing lists.~~ **(NOT REQUIRED)**
- ~~Providing administrative and technical support for Responsiveness Summary.~~ **(NOT REQUIRED)**
- Preparing presentation materials.
- Implementing other community involvement activities as identified by the site-specific CIP or EPA.
- Providing technical support to review Community Involvement deliverables and participate in public meetings.

Risk Identification

Value: 40% base fee

PROJECT INITIATION

WBS: 1.5

Perform project initiation and support that will lead to the selection of a removal action that eliminates, reduces, or controls risks to human health and the environment. Typical activities include, but are not limited to, the following:

- Developing data summaries.
- Compiling existing site data and reports.
- Identifying significant data gaps that limit ability to identify and evaluating removal alternatives.
- Developing a conceptual understanding of the site based on existing data.
- Identifying likely response scenarios and potentially applicable technologies that address site problems.
- Preparing conceptual exposure pathway analysis in accordance with Regional guidelines and OSWER Directives 9285.7-02B, 12/89, *Risk Assessment Guidance for Superfund, Volume 1: Human Health Evaluation Manual (Part A, Baseline Risk Assessment)*, Interim Final; 9285.7-01B, 12/91, *Risk Assessment Guidance for Superfund, Volume 1: Human Health Evaluation Manual (Part B, Development of Risk-Based Preliminary Remediation Goals)*; 9285.7-01C, 12/91 *Risk Assessment Guidance for Superfund, Volume 1: Human Health Evaluation Manual (Part C, Risk Evaluation of Remedial Alternatives)*; 9285.7-47, 12/01 *Risk Assessment Guidance for Superfund (RAGS), Volume 1: Human Health Evaluation Manual (Part D, Standardization Planning, Reporting and Review of Superfund Risk Assessments)* Final; and 9285.7-25, 2/97 *Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conduction Ecological Risk Assessment*.
- Initiating identification of Applicable or Relevant and Appropriate Requirements (ARARs) that affect selection of the removal action

FIELD INVESTIGATION/DATA ACQUISITION (FI)

WBS: 3

Collect environmental data required to support the NTCRS. Data acquisition begins with EPA's approval of the Field Sampling Plan (FSP). Typical activities include, but are not limited to, the following:

- Mobilization/demobilization.
- ~~Hydrogeological assessment. (NOT REQUIRED)~~
 - ~~Test boring and monitoring well installation and development~~
 - ~~Downhole geophysics~~
 - ~~Groundwater elevation measurements~~
 - ~~Surface water elevation measurements~~
- Soil boring, drilling, and testing: budget for (3) test borings in cap.
- Environmental sampling.

- ~~Field screening (NOT REQUIRED)~~
- ~~Groundwater sampling (NOT REQUIRED)~~
- Surface soil sampling: budget for (8) soil/sediment samples
- Soil boring/permeability sampling: budget for (3) permeability analysis
- ~~Surface water and sediment sampling (NOT REQUIRED)~~
- ~~Air monitoring (NOT REQUIRED)~~
- ~~Indoor sampling (NOT REQUIRED)~~
- ~~Reuse assessment. (NOT REQUIRED)~~
- ~~Geotechnical survey. (NOT REQUIRED)~~
- Field-generated waste characterization and disposal in accordance with local, State and Federal regulations.
- Site reconnaissance.
 - Ecological resources reconnaissance
 - ~~Well inventory (NOT REQUIRED)~~
 - ~~Existing well development and establishment of sampling points (NOT REQUIRED)~~
 - ~~Landfill gas emission sampling (NOT REQUIRED)~~
 - ~~Surface geophysical survey (NOT REQUIRED)~~
 - ~~On-site and residential well sampling (NOT REQUIRED)~~
 - ~~Surface water sampling (NOT REQUIRED)~~
 - Soil sampling
 - Sediment sampling
 - ~~Leachate sampling (NOT REQUIRED)~~
 - ~~Field screening (NOT REQUIRED)~~
 - ~~Tank and drum sampling (NOT REQUIRED)~~
- ~~Ecological Characterization. (NOT REQUIRED)~~
 - ~~Wetland and habitat delineation/function and value assessment~~
 - ~~Wildlife observations~~
 - ~~Benthic reconnaissance/community characterization~~
 - ~~Identification of endangered species and others of special concern~~
 - ~~Bioassays~~
 - ~~Bioaccumulation studies~~
 - ~~Biota sampling/population studies~~

SAMPLE ANALYSIS (SN)

WBS: 4

Analyze ~~split~~ samples taken to document and confirm sampling results and performance. A variety of mechanisms may be used to implement this task including: ~~field screening using mobile facilities or field portable equipment~~, the Contract Laboratory Program (CLP), laboratories procured under subpool or team subcontracts, ~~the Regional Environmental Services Division (ESD)~~, the Environmental Response Team (ERT) laboratory, or regionally procured laboratories. [NOTE: This task consists exclusively of performing sample analyses and producing analytical data. For cost estimating purposes, there should be no direct labor costs under this task - no hours should be reflected under this task, only dollars.]

Schedule, coordinate, track, and oversee sample analyses and validate analytical data. Typical activities include, but are not limited to, the following:

- Collecting, preparing, and shipping environmental samples in accordance with the Field Sampling Plan (FSP). The following types of sampling shall be required:
 - ~~Field screening~~ **(NOT REQUIRED)**
 - ~~Ground water sampling~~ **(NOT REQUIRED)**
 - Surface and subsurface soil sampling
 - ~~Surface water and~~ sediment sampling
 - ~~Air monitoring and sampling~~ **(NOT REQUIRED)**
 - ~~Biota sampling~~ **(NOT REQUIRED)**
 - ~~Other types of media sampling and screening~~ **(NOT REQUIRED)**
- Developing data quality objectives (DQO) for each sampling event; these DQOs shall be the determinative factor for assessing the success or failure of the sampling.
- Requesting, obtaining, and performing oversight of analytical services in compliance with EPA requirements.
- Coordinating with the EPA Sample Management Office (SMO), the Regional Sample Control Coordinator (RSCC), and/or the Region 6 Houston Laboratory regarding analytical support, data validation, and quality assurance issues.
- Implementing the EPA-approved laboratory quality assurance program that provides oversight of in-house and subcontracted laboratories through periodic performance evaluation sample analyses and/or on-site audits of operations and has a system of corrective actions.
- Providing sample management including chain of custody procedures, information management, sample retention, and 10-year data storage.
- Performing data validation, the process by which the quality of the data, the defensibility of the data, and the chain of custody are verified. Performing data validation in accordance with Regional guidelines.
- Reviewing data for usability for its intended purpose.
- Providing reports on data validation and usability.

Compile analytical and field data. Provide data in format that is compatible with Regional or National electronic data management network. Typical activities include, but are not limited to, the following:

- Data usability evaluation and field quality assurance/quality control (QA/QC).
- Data Reduction and Tabulation.

- ~~Data trend evaluation and/or modeling and submission of Technical Memorandum. (NOT REQUIRED)~~
- Data reduction and tabulation.
 - Soil boring ~~and monitoring well~~ logs.
 - Field sampling data.
 - ~~Hydrogeological testing data. (NOT REQUIRED)~~
 - ~~Geophysical data (downhole geophysics, survey). (NOT REQUIRED)~~
 - Analytical results.
- ~~Environmental Fate and Transport Modeling/Evaluation. (NOT REQUIRED)~~

Risk Assessment

Value: 40% Base Fee

RISK ASSESSMENT (RA)

WBS: 7

Conduct a **streamlined ecological risk evaluation** ~~baseline human health and ecological risk assessments~~. The objective of these assessments is to characterize and quantify, where appropriate, the current and potential ~~human health and~~ environmental risks that would prevail if no further remedial action is taken.

Risk Assessment must be done in accordance with applicable Agency guidance, directives and procedures.

IDENTIFICATION AND SCREENING OF REMOVAL ALTERNATIVES (IS)

WBS: 8

Identify and screen removal alternatives appropriate to the purpose and scope of the Non-Time Critical Removal Action that comply with ARARs to the maximum extent practicable.

ANALYSIS OF REMOVAL ALTERNATIVES (AL)

WBS: 9

Assess individual removal alternatives against the criteria of effectiveness, implementability and cost, in addition to comparative analysis of options. Recommend and conduct treatability studies at direction of EPA. EPA shall determine the selected removal alternative.

Engineering Evaluation and Cost Analysis

Value: 100% Award Fee

ENGINEERING EVALUATION/COST ANALYSIS (EE/CA) REPORT (EE)

WBS: 10

Prepare findings after data have been evaluated. The task includes all draft and final reports. Also includes providing technical assistance in the preparation of the **PRELIMINARY DRAFT** Action Memo, **however, EPA shall determine the selected removal alternative**. The EE/CA Report shall include a discussion of the following:

- Site Characterization.
 - Site description
 - Site background
 - Analytical data
 - Site conditions that justify a removal action
 - Reuse Assessment and Reasonably Anticipated Future Land Uses

- Risk Evaluation.
 - ~~Human health risks~~ **(NOT REQUIRED)**
 - Ecological risks
 - Proposed cleanup levels
- Identification of Removal Action Objectives.
 - Statutory limits on removal actions
 - Removal action scope
 - Removal action schedule
 - Applicable or Relevant and Appropriate Requirements
- Identification of Removal Action Alternatives.
- Analysis of Removal Alternatives.
 - Effectiveness
 - Implementability
 - Cost
- Comparative Analysis.
- Identification of ARARs.
- Provide technical assistance in the preparation of the Action Memorandum.
- Evaluation of Post-Removal Site control activities necessary to sustain the integrity of the Removal Action.

POST EE/CA SUPPORT (PE)

WBS: 11

Perform activities subsequent to the Engineering Evaluation/Cost Analysis (EE/CA). Typical activities include, but are not limited to, the following:

- Attending public meetings, briefings, public hearings, technical meetings with PRPs: budget for (1) meeting.
- Providing technical assistance in the preparation of the Responsiveness Summary.
- Providing technical assistance in the preparation of the Action Memorandum.

~~ADMINISTRATIVE RECORD (AR)~~ **(NOT REQUIRED)**

WBS: 12

~~Produce the Administrative Record. Typical activities include, but are not limited to, the following:~~

- ~~• Attending meetings with EPA TOM, Site Attorney, and Administrative Record Coordinator.~~
- ~~• Providing assistance in compiling documents comprising of the Administrative Record File in accordance with EPA Regional guidance or other procedures as specified.~~

- ~~Preparing Draft Administrative Record Index in accordance with EPA Regional guidance or other procedures as specified.~~
- ~~Preparing Administrative Record Index.~~
- ~~Coordinating duplication of Administrative Record.~~
- ~~Assembling Administrative Record and Index.~~

TASK ORDER CLOSEOUT (CO)

WBS: 13

Perform the necessary activities to close out the task order in accordance with contract requirements. Typical activities include but are not limited to, the following:

- Packaging and returning documents to the government.
- Duplicating/distribution/storage of files.
- Archiving files in accordance with Federal Record Center requirements.
- Preparing microfiche/microfilm/optical disk or other EPA-approved data storage technology.
- Preparing the closeout report in accordance with Regional guidance or other procedures as specified in the task order. If the final hours/budget is greater than +/- 10% of the original approved work plan/task order hours/budget, the TOCR shall describe the circumstances that explain why this occurred.

Attachment 1 - Summary of Major Submittals for Non-Time-Critical Removal Support - Gulfco Marine Maintenance Site

| DELIVERABLE | NO. OF COPIES | DUE DATE (calendar days) | EPA REVIEW PERIOD |
|---|---------------|--|--|
| Non-Time Critical Removal Support Work Plan | 1HC & 1EC | 30 days after receipt of the Statement of Work from EPA | 10 days after receipt of work plan |
| Monthly Progress Reports | 1HC & 1EC | Monthly and as required in the contract | NA |
| Site Management Plan (SMP) | 1HC & 1EC | 7 days after approval of NTCRS work plan | 3 days after receipt of plan |
| Health and Safety Plan (HASP) | 1HC & 1EC | 7 days after approval of NTCRS work plan | 3 days after receipt of plan |
| Sampling and Analysis Plan (SAP) | 1HC & 1EC | 7 days after approval of NTCRS work plan | 3 days after receipt of plan |
| Quality Assurance Project Plan (QAPP) | 1HC & 1EC | 7 days after approval of NTCRS work plan | 3 days after receipt of plan |
| Fact Sheets | 1EC | 5 days after notification from EPA | 3 days after receipt of fact sheet |
| Public Meeting Support Materials | TBD | One week prior to scheduled meeting | NA |
| Field Reports | 1EC | Friday of every week of field activities (covering activities through noon on Thursday) | 3 days after receipt |
| Data Validation Report | 1HC & 1EC | 7 days after receipt of all analytical results from laboratory | 3 days after receipt |
| Data Evaluation Summary Report | 1HC & 1EC | 7 days after receipt of all analytical results from laboratory | 3 days after receipt |
| Human Health Risk Assessment Report (NOT REQUIRED) | 3 | [number] days after completion of field investigations | [number] days after receipt |
| Ecological Risk Assessment Report (include with EE/CA Report) | 3 | [number] days after completion of field investigations | [number] days after receipt |
| Removal Alternative Technical Memorandum (include with EE/CA Report) | 3 | [number] days after completion of field investigations | [number] days after receipt |
| Removal Alternatives Evaluation (include with EE/CA Report) | 3 | [number] days after completion of removal alternative technical memorandum | [number] days after receipt |
| Draft EE/CA Report | 3HC & 1EC | 50 days after approval of NTCRS work plan [number] days after completion of removal alternatives evaluation | 9 days after receipt |
| Final EE/CA Report | 3HC & 1EC | 8 days after receipt of EPA comments on draft EE/CA Report | 4 days after receipt |

Gulfco EE/CA

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| DELIVERABLE | NO. OF COPIES | DUE DATE (calendar days) | EPA REVIEW PERIOD |
|-------------------------------|----------------------|---|---------------------------------|
| Preliminary Draft Action Memo | 1HC & 1EC | 14 days after final EE/CA report submitted | 10 days after receipt of memo |
| Closeout Report | 1HC & 1EC | 30 days after Preliminary Draft Action Memo submitted | 21 days after receipt of report |
| Final Costs | 1HC & 1EC | 90 days after task order closeout | NA |

Attachment 2 - Work Breakdown Structure (WBS) for Non-Time-Critical Removal Support (NTCRS)

Task 1 Project Planning and Support (PP)

- 1.1 Project planning.
 - 1.1.1 Attend scoping meeting.
 - 1.1.2 Conduct site visit.
 - 1.1.3 Develop Work Plan and cost estimate
 - 1.1.4 Negotiate Work Plan and Cost Estimate.
 - 1.1.5 Provide conflict of interest disclosure.
- 1.2 Site-specific plans.
 - 1.2.1 Sampling and Analysis Plan (SAP).
 - 1.2.2 Health and Safety Plan (HSP)
- 1.3 Pollution liability insurance
- 1.4 Project management.
 - 1.4.1 Monitor costs and prepare periodic status reports.
 - 1.4.2 Participate in meetings/communicate routinely/prepare meeting notes.
 - 1.4.3 Manage, track, and report status of site-specific equipment.
 - 1.4.4 Accommodate any external audit or review mechanism that EPA shall require.
 - 1.4.5 Evaluate existing data, including usability, when directed by EPA.
 - 1.4.6 Coordinate with local and emergency response teams.
 - 1.4.7 Review background documents as directed by EPA.
 - 1.4.8 Attend EPA-held training.
- 1.5 Project initiation and support.
 - 1.5.1 Develop data summaries.
 - 1.5.2 Compile existing site data and reports.
 - 1.5.3 Identify significant data gaps that limit ability to identify and evaluate removal alternatives.
 - 1.5.4 Develop a conceptual understanding of the site based on existing data.
 - 1.5.5 Identify likely response scenarios and potentially applicable technologies and operable units that address site problems.
 - 1.5.6 Prepare conceptual exposure pathway analysis.
 - 1.5.7 Initiate identification of Applicable or Relevant and Appropriate Requirements (ARARs) that affect selection of removal action.

Task 2 Community Involvement (CR)

- 2.1 ~~Conduct community interviews.~~ **(NOT REQUIRED)**
- 2.2 ~~Prepare Community Involvement Plan (CIP).~~ **(NOT REQUIRED)**
- 2.3 Provide public meeting and/or open house support.
- 2.4 Prepare fact sheets, notices and other informational documents.
- 2.5 ~~Provide support for proposed plan.~~ **(NOT REQUIRED)**
- 2.6 ~~Provide public hearing support.~~ **(NOT REQUIRED)**
- 2.7 Publish public notices in local newspapers serving the site community.
- 2.8 Maintain public information repositories.
- 2.9 ~~Develop and update site mailing list.~~ **(NOT REQUIRED)**
- 2.10 ~~Provide administrative and technical support for Responsiveness Summary.~~ **(NOT REQUIRED)**
- 2.11 Prepare presentation materials.
- 2.12 Implementation of other Community Involvement activities as identified by the site-specific Community Involvement Plan or EPA.
- 2.13 Provide technical support to review Community Involvement deliverables and participate in public meetings.

Task 3 Field Investigation/Data Acquisition (FI)

- 3.1 Mobilization/demobilization.
- 3.2 ~~Hydrogeological assessment.~~ **(NOT REQUIRED)**
- 3.3 Soil boring, drilling, and testing.
- 3.4 Environmental sampling.
- 3.5 ~~Reuse assessment.~~ **(NOT REQUIRED)**

- 3.6 ~~Geotechnical survey.~~ (NOT REQUIRED)
- 3.7 Field-generated waste characterization and disposal in accordance with local, state and federal regulations.
- 3.8 Site reconnaissance.
- 3.9 ~~Ecological characterization.~~ (NOT REQUIRED)

Task 4 Sample Analysis (SN)

- 4.1 Sample analyses and production of analytical data. [NOTE: For cost estimating purposes there should be no direct labor costs under this task - no hours should be reflected under this task, only dollars.]

Task 5 Analytical Support and Data Validation (AN)

- 5.1 Collect, prepare, and ship environmental samples in accordance with the Field Sampling Plan (FSP).
 - 5.1.1 ~~Field screening.~~ (NOT REQUIRED)
 - 5.1.2 ~~Ground water sampling.~~ (NOT REQUIRED)
 - 5.1.3 Surface and subsurface soil sampling.
 - 5.1.4 ~~Surface water and~~ sediment sampling.
 - 5.1.5 ~~Air monitoring and sampling.~~ (NOT REQUIRED)
 - 5.1.6 ~~Biota sampling.~~ (NOT REQUIRED)
 - 5.1.7 ~~Other types of media sampling and screening.~~ (NOT REQUIRED)
- 5.2 Develop performance or acceptance criteria (such as data quality objectives (DQO)) for each sampling event; these criteria shall be the determinative factor for assessing the success or failure of the sampling.
- 5.3 Request, obtain, and perform oversight of analytical services in compliance with EPA requirements.
- 5.4 Coordinate with the EPA Sample Management Office (SMO), the Regional Sample Control Coordinator (RSCC), and/or the Environmental Services Division (ESD) regarding analytical support, data validation, and quality assurance issues.
- 5.5 Implement the EPA-approved laboratory quality assurance program that provides oversight of in-house and subcontracted laboratories through periodic performance evaluation sample analyses and/or on-site audits of operations and has a system of corrective actions.
- 5.6 Provide sample management including chain of custody procedures, information management, sample retention, and 10-year data storage.
- 5.7 Perform data validation, the process by which the quality of the data, the defensibility of the data, and the chain of custody are verified. Perform data validation in accordance with Regional guidelines.
- 5.8 Review data for usability for its intended purpose.
- 5.9 Provide reports on data validation and usability.

Task 6 Data Evaluation (DE)

- 6.1 Combine analytical and field data, providing data in a format that is compatible with Regional or national electronic data management network.
 - 6.1.1 Data usability evaluation and field quality assurance/quality control (QA/QC).
 - 6.1.2 Data reduction and tabulation.
 - 6.1.3 ~~Data trend evaluation and/or modeling and submission of Technical Memorandum.~~ (NOT REQUIRED)
- 6.2 Data reduction, tabulation, and evaluation.
- 6.4 ~~Environmental fate and transport modeling/evaluation.~~ (NOT REQUIRED)

Task 7 Risk Assessment (RA)

- 7.1 ~~Conduct a baseline human health risk assessment.~~ (NOT REQUIRED)
- 7.2 Conduct an **ecological risk evaluation** ~~baseline ecological risk assessment.~~
- 7.3 Prepare draft risk **evaluation** ~~assessment~~ reports. (include with draft EE/CA Report)
- 7.4 Prepare final risk **evaluation** ~~assessment~~ reports. (include with final EE/CA Report)

Task 8 Identification and Screening of Removal Alternatives (IS)

- 8.1 Identify and screen appropriate removal alternatives.

Task 9 Analysis of Removal Alternatives (AL)

- 9.1 Assess individual removal alternatives.
- 9.2 Perform a comparative analysis of options.
- 9.3 Recommend treatability studies.

9.4 Conduct treatability studies at direction of EPA.

Task 10 Engineering Evaluation/Cost Analysis (EE/CA) Report (EE)

10.1 Prepare draft EE/CA Report(s).

10.2 Prepare final EE/CA Report.

Task 11 Post EE/CA Support (PE)

11.1 Attend public meetings, briefings, public hearings, technical meetings with PRPs.

11.2 Provide technical assistance in the preparation of the Responsiveness Summary.

11.3 Provide technical assistance in the preparation of the Action Memorandum.

Task 12 Administrative Record (NOT REQUIRED) (AR)

~~12.1 Attend meeting with EPA TOM, Site Attorney, and Administrative Record Coordinator.~~

~~12.2 Provide assistance in compiling documents comprising of the Administrative Record File in accordance with EPA Regional guidance or other procedures as specified.~~

~~12.3 Prepare Draft Administrative Record Index in accordance with EPA regional guidance or other procedures as specified.~~

~~12.4 Prepare Administrative Record Index.~~

~~12.5 Coordinate duplication of Administrative Record.~~

~~12.6 Assemble Administrative Record and Index.~~

Task 13 Task order Closeout (CO)

13.1 Package and return documents to the government.

13.2 Duplicate, distribute, and store files.

13.3 Archive files in accordance with Federal Record Center requirements.

13.4 Produce microfiche/microfilm/optical disk or other EPA-approved storage format.

13.5 Prepare the Task order Closeout Report (WACR).

Attachment 3 - Regulations and Guidance Documents

The following list, although not comprehensive, consists of many of the regulations and guidance documents that apply to the NTCRS process:

1. American National Standards Practices for Respiratory Protection. American National Standards Institute Z88.2-1980, March 11, 1981.
2. ARCS Construction Contract Modification Procedures September 89, OERR Directive 9355.5-01/FS.
3. CERCLA Compliance with Other Laws Manual, Two Volumes, U.S. EPA, Office of Emergency and Remedial Response, August 1988 (DRAFT), OSWER Directive No. 9234.1-01 and -02.
4. Community Relations in Superfund √ A Handbook, U.S. EPA, Office of Emergency and Remedial Response, January 1992, OSWER Directive No. 9230.0-3C.
5. A Compendium of Superfund Field Operations Methods, Two Volumes, U.S. EPA, Office of Emergency and Remedial Response, EPA/540/P-87/001a, August 1987, OSWER Directive No. 9355.0-14.
6. Construction Quality Assurance for Hazardous Waste Land Disposal Facilities, U.S. EPA, Office of Solid Waste and Emergency Response, October 1986, OSWER Directive No. 9472.003.
7. Contractor Requirements for the Control and Security of RCRA Confidential Business Information, March 1984.
8. Data Quality Objectives for Remedial Response Activities, U.S. EPA, Office of Emergency and Remedial Response and Office of Waste Programs Enforcement, EPA/540/G-87/003, March 1987, OSWER Directive No. 9335.0-7B.
9. Engineering Support Branch Standard Operating Procedures and Quality Assurance Manual, U.S. EPA Region IV, Environmental Services Division, April 1, 1986 (revised periodically).
10. EPA NEIC Policies and Procedures Manual, EPA-330/9-78-001-R, May 1978, revised November 1984.
11. Federal Acquisition Regulation, Washington, DC: U.S. Government Printing Office (revised periodically).
12. Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, Interim Final, U.S. EPA, Office of Emergency and Remedial Response, October 1988, OSWER Directive NO. 9355.3-01.
13. Guidance on EPA Oversight of Remedial Designs and Remedial Actions Performed by Potential Responsible Parties, U.S. EPA Office of Emergency and Remedial Response, EPA/540/G-90/001, April 1990.
14. Guidance on Expediting Remedial Design and Remedial Actions, EPA/540/G-90/006, August 1990.
15. Guidance on Remedial Actions for Contaminated Ground Water at Superfund Sites, U.S. EPA Office of Emergency and Remedial Response (DRAFT), OSWER Directive No. 9283.1-2.
16. Guide for Conducting Treatability Studies Under CERCLA, U.S. EPA, Office of Emergency and Remedial Response, Prepublication version.
17. Guide to Management of Investigation-Derived Wastes, U.S. EPA, Office of Solid Waste and Emergency Response, Publication 9345.3-03FS, January 1992.
18. Guidelines and Specifications for Preparing Quality Assurance Project Plans, U.S. EPA, Office of Research and Development, Cincinnati, OH, QAMS-004/80, December 29, 1980.
19. Health and Safety Requirements of Employees Employed in Field Activities, U.S. EPA, Office of Emergency and Remedial Response, July 12, 1982, EPA Order No. 1440.2.
20. Interim Guidance on Compliance with Applicable of Relevant and Appropriate Requirements, U.S. EPA, Office of Emergency and Remedial Response, July 9, 1987, OSWER Directive No. 9234.0-05.
21. Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans, U.S. EPA, Office of Emergency and Remedial Response, QAMS-005/80, December 1980.
22. Methods for Evaluating the Attainment of Cleanup Standards: Vol. 1, Soils and Solid Media, February 1989, EPA 23/02-89-042; vol. 2, Ground water (Jul 1992).
23. National Oil and Hazardous Substances Pollution Contingency Plan; Final Rule, Federal Register 40 CFR Part 300, March 8, 1990.
24. NIOSH Manual of Analytical Methods, 2nd edition. Volumes I-VII for the 3rd edition, Volumes I and II, National Institute of Occupational Safety and Health.
25. Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities, National Institute of Occupational Safety and Health/Occupational Health and Safety Administration/United States Coast Guard/Environmental Protection Agency, October 1985.
26. Permits and Permit Equivalency Processes for CERCLA On-Site Response Actions, February 19, 1992, OSWER Directive 9355.7-03.
27. Procedure for Planning and Implementing Off-Site Response Actions, Federal Register, Volume 50, Number 214, November 1985, pages 45933-45937.

28. Procedures for Completion and Deletion of NPL Sites, U.S. EPA, Office of Emergency and Remedial Response, April 1989, OSWER Directive No. 9320.2-3A.
 29. Quality in the Constructed Project: A Guideline for Owners, Designers and Constructors, Volume 1, Preliminary Edition for Trial Use and Comment, American Society of Civil Engineers, May 1988.
 30. Remedial Design and Remedial Action Handbook, U.S. EPA, Office of Emergency and Remedial Response, June 1995, OSWER Directive No. 9355.5-22.
 31. Revision of Policy Regarding Superfund Project Assignments, OSWER Directive No. 9242.3-08, December 10, 1991. [Guidance, p. 2-2]
 32. Scoping the Remedial Design (Fact Sheet), February 1995, OSWER Publ. 9355-5-21 FS.
 33. Standard Operating Safety Guides, U.S. EPA, Office of Emergency and Remedial Response, November 1984.
 34. Standards for the Construction Industry, Code of Federal Regulations, Title 29, Part 1926, Occupational Health and Safety Administration.
 35. Standards for General Industry, Code of Federal Regulations, Title 29, Part 1910, Occupational Health and Safety Administration.
 36. Structure and Components of 5-Year Reviews, OSWER Directive No. 9355.7-02, May 23, 1991. [Guidance, p. 3-5]
 37. Superfund Guidance on EPA Oversight of Remedial Designs and Remedial Actions Performed by Potentially Responsible Parties, April 1990, EPA/540/G-90/001.
 38. Superfund Remedial Design and Remedial Action Guidance, U.S. EPA, Office of Emergency and Remedial Response, June 1986, OSWER Directive No. 9355.0-4A.
 39. Superfund Response Action Contracts (Fact Sheet), May 1993, OSWER Publ. 9242.2-08FS.
 40. TLVs-Threshold Limit Values and Biological Exposure Indices for 1987-88, American Conference of Governmental Industrial Hygienists.
 41. Treatability Studies Under CERCLA, Final. U.S. EPA, Office of Solid Waste and Emergency Response, EPA/540/R-92/071a, October 1992.
 42. USEPA Contract Laboratory Program Statement of Work for Inorganic Analysis, U.S. EPA, Office of Emergency and Remedial Response, July 1988.
 43. USEPA Contract Laboratory Program Statement of Work for Organic Analysis, U.S. EPA, Office of Emergency and Remedial Response, February 1988.
 44. User's Guide to the EPA Contract Laboratory Program, U.S. EPA, Sample Management Office, August 1982.
 45. Value Engineering (Fact Sheet), U.S. EPA, Office of Solid Waste and Emergency Response, Publication 9355.5-03FS, May 1990.
 46. Guide to Documenting Cost and Performance for Remediation Projects, Publication EPA-542-B-95-002, March 1995.
 47. Presumptive Remedies: Policy and Procedures, U.S. EPA, Office of Solid Waste and Emergency Response, Directive 9355.0-47FS, EPA 540-F-93-047, PB 93-963345, September, 1993.
 48. Presumptive Remedies for Soils, Sediments, and Sludges at Wood Treater Sites, U.S. EPA, Office of Solid Waste and Emergency Response, Directive 9200.5-162, EPA/540/R-95/128, PB 95-963410, November, 1995.
 49. Presumptive Response Strategy and Ex-Situ Treatment Technologies for Contaminated Groundwater at CERCLA Sites, U.S. EPA, Office of Solid Waste and Emergency Response, Directive 9283.1-12, EPA 5401R/023, June, 1996.
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See the following guidance documents for more information on performance-based contracting:

50. A Guide to Best Practices for Performance-Based Service Contracting, Office of Federal Procurement Policy, April 1996.
51. A Guide to Best Practices for Performance-Based Service Contracting, Final Edition, Office of Federal Procurement Policy, October 1998.
52. Performance-Based Contracting (Fact Sheet), U.S. EPA, Office of Emergency and Remedial Response, Draft February 1999.
53. Policy Letter 91-2, To The Heads of Executive Agencies and Departments, April 9, 1991.

Attachment 4 - Transmittal Of Documents For Acceptance By EPA

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| TRANSMITTAL OF DOCUMENTS FOR ACCEPTANCE BY EPA | | DATE: | TRANSMITTAL NO. |
| TO: | | FROM: | <div>↕ New Transmittal</div> <div>↕ Re-submittal of Transmittal No. _____</div> |
| SUBTASK NO. | DELIVERABLE | NO. OF COPIES | REMARKS |
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| DOCUMENTS FOUND ACCEPTABLE (LIST BY SUBTASK NO.) | | NAME/TITLE/SIGNATURE OF REVIEWER | |

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Attachment 5 - Transmittal Register

| TRANSMITTAL REGISTER | | | | | | | | |
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| PROJECT TITLE AND LOCATION | | | | CONTRACT NO. | | | WORK ASSIGNMENT NO. | |
| Subtask No. | DELIVERABLE | No. of Copies | Due Date | Transmittal No. | Date Received | Date Comments Sent to Contractor | EPA Acceptance Date | REMARKS |
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